

AO 91 (Rev. 02/09) Criminal Complaint

*Felony*

UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

APR 6 2015

David J. Bradley, Clerk of Court

United States of America  
v.

Case No. *B-15-MJ-322*

Roberto Lee Garcia

*Defendant*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of April 6, 2015 in the county of Cameron in the Southern District of Texas, the defendant violated 21 U.S.C. § 841 & 846,

an offense described as follows:

Knowingly and intentionally possess and conspire to possess with the intent to distribute 2.10 kilograms of Cocaine, a Schedule II Controlled Substance, into the United States from the Republic of Mexico.

This criminal complaint is based on these facts:

On April 5, 2015, Roberto Lee GARCIA attempted entry into the United States from Mexico at the Veterans International Port of Entry, Brownsville, Texas. A stolen vehicle report was discovered by CBP Officers for the 1993 Jeep Cherokee Sport being operated by GARCIA. GARCIA, reported to be Armed and Dangerous, was escorted to a holding cell. GARCIA provided a negative declaration to CBP Officers for any prohibited items. During the vehicle inspection, CBP Officers discovered a total of two packages hidden in the vehicle's rear quarter panel. Upon further inspection, the two packages were found to contain a white powdery substance, which field-tested positive for cocaine with a total weight of 2.10 kilograms. GARCIA was advised of his rights and agreed to speak with Special Agents of Homeland Security Investigations, Harlingen, TX. During the interview GARCIA denied knowledge of the cocaine discovered in the vehicle.

☐ Continued on the attached sheet.

*[Signature]*

Complainant's signature

Marisella Valenzuela, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: April 6, 2015

*[Signature]*

Judge's signature

City and state: Brownsville, Texas

Ronald G. Morgan, U.S. Magistrate Judge

Printed name and title